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November 13, 2023

VIA ECF

Hon. Victoria Reznik
U.S. District Court
Southern District of New York

Re: ***Gordon Brush Mfg. Co., Inc. v.
Allstar Marketing Group, LLC***
Case No: 7:22-cv-05978-KMK-VR

Dear Judge Reznik:

We represent Defendant Allstar Marketing Group, LLC in the above-referenced matter. Defendant and Plaintiff Gordon Brush Mfg. Co., Inc. jointly write regarding the progress of discovery pursuant to the Court's November 9, 2023 Order.

On September 29, 2023, Plaintiff clarified that Spring Chang, Michael Fu and Yang Luo are not fact witnesses. According to Plaintiff, they are consulting experts and Plaintiff is asserting a trial preparation and attorney work product privilege over all information and documents pertaining to these individuals and the Chang Tsi & Partners law firm.

On October 17, 2023, the inspection of tangible things in the custody of 4C Logistics was completed without incident. The ancillary action in the U.S. District Court for the Northern District of Illinois related to the subpoena for such inspection has now been dismissed pursuant to a stipulation by the parties.

Plaintiff did not disclose any non-mold experts by its October 13, 2023 deadline. Plaintiff did not disclose any mold experts by its October 24, 2023 deadline. Defendant's Rule 34 inspection of all tangible things in the possession, custody or control of Plaintiff is presently scheduled to take place on November 14, 2023 in Fort Meyers, Florida.

Respectfully submitted,

/s/ Jacob R. Zissu
Jacob R. Zissu
Counsel for Defendant
Allstar Marketing Group, LLC

Cc: ALL PARTIES IN INTEREST VIA ECF

Mark Niede
Counsel for Plaintiff
Gordon Brush Mfg. Co., Inc.